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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARDO RUIZ-AMADOR,

Defendant.

Case No: 1:25-CR-00061-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Kara Ottervanger, counsel for Leonardo Ruiz-Amador (“defendant”), that this action’s **Wednesday, September 10, 2025, status conference be continued to Wednesday, October 22, 2025, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on March 27, 2025. ECF 9. The government prepared and delivered an initial set of discovery to defense counsel within the time limits set forth by Eastern District of California Local Rule 440. The defense is and has been reviewing discovery thus far provided.

2. The government will follow up with law enforcement to determine the extent additional supplemental discovery exists. If the government identifies additional information that should be produced as supplemental discovery, the government will promptly produce it to defense counsel in accord with Rule 16.
3. On May 21, the Court set a motions briefing schedule and a motions hearing for September 8. ECF 15. The Court also set a continued status conference for September 10 and excluded time through that date. ECF 15.
4. On June 20, 2025, the defendant filed a motion to dismiss. ECF 16. The government filed its opposition on July 21. ECF 17. The parties anticipate appearing and arguing the motion on September 8.
5. If the Court denies the defendant's motion to dismiss, defense counsel will need additional time to speak with the defendant about the case, conduct any additional investigation, and consider any additional motions. Accordingly, defense counsel is requesting to continue the status conference set for September 10, 2025, to October 22, 2025. Defense counsel believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance.
7. The parties therefore stipulate that the period of time from September 10, 2025, through October 22, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh

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the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: August 28, 2025

ERIC GRANT
United States Attorney

By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant United States Attorney

Dated: August 28, 2025

By: /s/ KARA OTTERVANGER
KARA OTTERVANGER
Counsel for Defendant

ORDER

IT IS ORDERED that the status conference currently set for September 10, 2025, at 1:00 pm is continued to **October 22, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.**

IT IS FURTHER ORDERED THAT the period of time from September 10, 2025, through and including October 22, 2025, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: August 28, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE